

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**THOMAS TRAVIS AND
CATHY PAPAGEORGE**

Plaintiffs

v.

**CITY OF GLENN HEIGHTS, TEXAS;
JAMES WEISBRUSH, Individually;
THOMAS WILSON, Individually;
JAMES LONEY, Individually; and
PHILIP PRASIFKA, Individually
Defendants**

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CIVIL ACTION NO. 3:14-cv-03232

**MOTION TO WITHDRAW AS ATTORNEY OF RECORD
FOR THOMAS TRAVIS AND CATHY PAPAGEORGE**

TO THE HONORABLE COURT:

Comes now Kevin S. Wiley, Jr. of the Law Offices of Kevin S. Wiley, Jr. (the “Movant”), attorney for the named Plaintiffs, Thomas Travis and Cathy Papageorge (the “Plaintiffs”), and in accordance with the requirements the Local Rule 83.12(a) of the Local Rules for United States District Court for the Northern District of Texas, Dallas Division, respectfully requests leave of Court to withdraw as counsel for Plaintiffs, and in support of this Motion would show as follows:

Movant would show that good cause exists for his withdrawal in that Plaintiffs, by their submission of their Motion to proceed Pro Se [Docket No. 79], and by their signatures below¹, desire to release Movant from his duties as counsel for the Plaintiffs.

Movant would further show that the attorney/client relationship between Movant and Plaintiffs can no longer be sustained in this matter due to untenable disagreements between the

¹ Movant has been granted permission to use the digital signatures of the Plaintiffs via e-mail correspondence.

parties on how to proceed with the prosecution of this case.

Finally, Movant submits that this withdrawal is not sought for delay only, but for the efficient administration of this case.

WHEREFORE, PREMISES CONSIDERED, Kevin S. Wiley, Jr. respectfully requests that this Court enter an order permitting him to withdraw as attorney of record for Plaintiffs, Thomas Travis and Cathy Papageorge.

Respectfully Submitted,
LAW OFFICES OF KEVIN S. WILEY, JR.

By: /s/ Kevin S. Wiley, Jr.
Kevin S. Wiley, Jr.
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

The undersigned certifies that on this 15th day of July, 2015, I contacted Defendants' counsel of record MICHAEL J. MERRICK of CANTEY HANGER LLP, 1999 Bryan Street, Suite 3300 Dallas, Texas 75201-6822 regarding the relief requested in this Motion via email and Mr. Merrick expressed Defendants are un-opposed to the relief requested herein.

/s/ Kevin S. Wiley, Jr.
Kevin S. Wiley, Jr.

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copy of the foregoing has been served on July 15, 2015 to Defendants' counsel of record DARRELL G-M NOGA and MICHAEL J. MERRICK of CANTEY HANGER LLP, 1999 Bryan Street, Suite 3300 Dallas, Texas 75201-6822 via electronic case filing.

/s/ Kevin S. Wiley, Jr.
Kevin S. Wiley, Jr.

Approved as to form and substance:

/s/ Cathy Papageorge

Cathy Papageorge

/s/ Thomas Travis

Thomas Travis